

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:

Hassan E. Coombs	:	Chapter 13
Chemisa I. Coombs	:	
Debtor(s)	:	
	:	
FREEDOM MORTGAGE CORPORATION	:	Case No.: 19-14475 MDC
Movant(s)	:	
vs.	:	
	:	
Hassan E. Coombs, Chemisa I. Coombs,	:	
And William C. Miller, Trustee	:	
Respondent(s)	:	

**RESPONSE TO MOTION OF FREEDOM MORTGAGE CORPORATION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW COME, Hassan E. Coombs and Chemisa I. Coombs, Debtors, by and through their attorney, Kimberly D. Martin, and file this Response as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied and strict proof thereof is demanded at trial.
7. Denied and strict proof thereof is demanded at trial.
8. Denied and strict proof thereof is demanded at trial.
9. Denied and strict proof thereof is demanded at trial.
10. Denied and strict proof thereof is demanded at trial.

WHEREFORE, Hassan E. Coombs and Chemisa I. Coombs, Debtors, respectfully request this Honorable Court deny Movant's Motion for Relief and for such other and further relief as the Court deems just and proper.

Dated: 12/18/2020

Respectfully Submitted,

_____/s/_____
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